

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**LAURA ABRAMS on behalf of herself
and all others similarly situated,**

Plaintiff,

v.

**THE SAVANNAH COLLEGE OF ART
AND DESIGN, INC.**

Defendant.

**CIVIL ACTION NO.
1:22-CV-04297-LMM**

**DECLARATION OF BRYN BRIDLEY
ON NOTICE AND SETTLEMENT
ADMINISTRATION**

I, BRYN BRIDLEY, declare as follows:

1. I am the Director of Project Management at Atticus Administration, LLC (“Atticus”), a firm providing class action and claims administration services. I have extensive experience with class action notice, claims processing, and settlement administration. I am fully familiar with the facts contained herein based upon my personal knowledge and involvement in this matter.

2. Atticus is the Settlement Administrator for the above-captioned action and is responsible for carrying out the terms of the *Settlement Agreement and Release* (“Settlement Agreement”) as approved by the Court in the *Order Granting Preliminary Approval of Class Action Settlement* (“Preliminary Approval Order”) dated April 10, 2023.

3. I submit this Declaration to inform the Parties and the Court of the settlement administration activities completed to-date. This Declaration describes: (i) disbursement of CAFA notices, (ii) the methods used to disseminate Notice to the Settlement Class, (iii) the Settlement Website and toll-free information line, (iv) the receipt and processing of exclusion requests and objections, (v) receipt and verification of Claim Forms, and (vi) settlement administration costs.

I. CAFA NOTICE

4. In accordance with the Class Action Fairness Act, U.S.C § 1715 (“CAFA”), Atticus mailed notice of the proposed settlement to 51 state/territory Attorneys General and the federal Attorney General of the United States via U.S. Priority Mail on March 24, 2023. Each CAFA packet included an explanatory letter from Atticus as the “Office of the Claims Administrator,” and a CD-ROM enclosure that contained the Class Action Complaint, Settlement Agreement with Exhibits, Proposed Preliminary Approval Order, attestations in support of preliminary approval, a declaration regarding the adequacy of the notice plan, and a breakdown of the estimated Settlement Class Members by state of residence, as well as contact information for Counsel for Defendant (the “CAFA Notice”). A true and correct copy of the CAFA letter template is attached hereto as **Exhibit A**.

II. SETTLEMENT CLASS NOTICE

5. On April 18, 2023, Atticus received a data file from Defense Counsel that contained the name, mailing address, and email address for 16,888 persons to whom The Savannah College of Art and Design (“SCAD” or “Defendant”) previously sent notice of a Data Security Incident that occurred in August 2022 (“Settlement Class,” “Class Members,” or “Class”). Atticus reviewed the contents of the file and found no incomplete or inaccurate contents. The final Class list was processed through the National Change of Address database maintained by the United States Postal Service (“USPS”). This process returns address updates for persons who have filed change of address cards with the USPS anytime in the past four (4) years.

6. On May 5, 2023, Notice was mailed to 16,888 Settlement Class Members in the form of a “complex” or four-panel postcard (“Short Form Notice”) via U.S. first class mail. Of the 16,888 Short Form Notices sent by mail, 3000 were returned to Atticus as undeliverable. One hundred sixteen (116) of the returned pieces included forwarding information and were promptly remailed to the forwarding addresses provided by the USPS. Of the remaining 2,884 undeliverable addresses without forwarding information, 2,884 were sent to a professional

service for address tracing. In total, addresses were obtained for 2,145 records and were not received for 587 records. Short Form Notices were promptly remailed to the 2,145 addresses received from trace. One hundred forty-seven (148) of the remailed notices were returned to Atticus a second time and deemed undeliverable. One hundred fifty (152) undeliverable records were not traced because they were returned to Atticus at or after the Class Members' response deadline. Thus, 16,004 Class Members accounting for 94.76% of the Settlement Class were successfully mailed the Short Form Notice. The Short Form Notice also included a perforated tear-off Claim Form that could be completed and returned by mail. A true and correct copy of the mailed Short Form Notice is attached hereto as **Exhibit B**.

7. On May 10, 2023, Atticus also caused the Long Form Notice to be sent by electronic mail ("email") to 13,796 Settlement Class Member for whom complete email addresses were received. Of the total notices sent by email, 10,363 were successfully delivered, 5,545 were opened, and 638 click-throughs to the Settlement Website occurred. A true and correct copy of the emailed Long Form Notice is attached hereto as **Exhibit C**.

8. On July 10, 2023, Atticus also caused the Long Form Notice to be sent by email to 12,725 Settlement Class Members who had not yet filed a Claim Form. Of the total notices sent by email, 9,463 were successfully delivered, 5,424 were opened and 452 click-throughs to the Settlement Website occurred.

III. SETTLEMENT WEBSITE AND TOLL-FREE INFORMATION LINE

9. Atticus purchased the URL and established the content located at www.savannahcollegedatasettlement.com as the Settlement Website for this action. The URL address was included in the mailed notice, a direct link in the email notice, and provided to callers in the front-end message on the toll-free settlement information line. The website was made public on April 24, 2023 in accordance with the Preliminary Approval Order and has remained fully operational since that time. The website includes answers to frequently asked questions, access to viewable, printable, and downloadable copies of the Long Form Notice, Claim Form, and other settlement documents filed with the Court, a summary of the key dates and deadlines

in the settlement, and contact information for Atticus. The website also includes an online Claim Form that Settlement Class Members can complete and submit electronically using a unique claimant identification number that is allocated to each Class Member and provided in/on the notices they receive. Atticus secured the toll-free telephone number 1-888-230-9714 as the settlement line for this matter. The telephone number was activated on May 10, 2023, the same day the mailed and emailed notices were disseminated and has remained fully operational since that time. The settlement line is answered by Atticus' live customer support specialists during normal business hours, Monday through Friday. Settlement Class Members who call the toll-free line after hours or when a specialist is unavailable during covered hours have the option to leave a voicemail message and receive a return call from the support team. Voicemails are reviewed and callbacks are completed by Atticus support staff on a daily basis. The website has received 4,873 visits and the toll-free line 214 calls. A copy of the Long Form Notice and Claim Form as are available for download from the Settlement Website are attached hereto as **Exhibit D**.

IV. EXCLUSION REQUESTS AND OBJECTIONS

10. Settlement Class Members who did not wish to be bound by the terms of the Settlement had until July 10, 2023 to postmark or otherwise submit a written request to be excluded from the Settlement. Atticus received exclusion requests from 12 Settlement Class Members – 11 of the requests received were timely and otherwise valid and one (1) was untimely postmarked on July 14, 2023. Copies of the exclusion requests have been provided to the Parties as received throughout the Class Member response period.

11. Settlement Class Members also had until July 10, 2023, to file an objection to the Settlement's terms. Atticus received one (1) untimely objection that included a July 11, 2023 postmark. The objection also did not comply with the requirements of the Settlement Agreement, nor was it sent by mail to the Court or our office. A copy of the untimely objection is attached as **Exhibit E**.

V. CLAIM FORMS

12. Settlement Class Members are required to complete and submit a Claim Form on or before August 8, 2023 to be eligible for monetary compensation – including a pro-rata payment, reimbursement for out-of-pocket losses, and reimbursement for lost time.

13. Atticus had received 1,821 claim submissions. Of the claims received, 1,122 were filed via the website and 695 were sent by mail and four (4) were returned by email. Furthermore, on July 10, 2023, Atticus sent a Claim Form filing deadline reminder email to 12,768 Settlement Class Members for whom email addresses were available and who had not yet filed claims. A copy of the reminder email is attached hereto as **Exhibit F**.

14. As part of the claims validation process, Settlement Class Members whose claims are determined to be incomplete or deficient during the review and verification process were notified by mail of the preliminary determination(s) and allowed 30 days to respond and correct or complete (“Cure”) the identified claim deficiencies. Cure letters were sent for unsigned and incomplete claims and missing or insufficient support documentation. A true and correct copy of the Notice of Deficient Claim Form / Opportunity to Correct letter template is attached hereto as **Exhibit G**.

15. Fifty-eight (58) Cure letters were mailed that addressed 62 total form deficiencies, including five (5) unsigned forms, five (5) forms without any benefits elected, seven (7) missing out-of-pocket expense information, and 44 with invalid or no documentation to support the out-of-pocket claims made. The Cure letter results include three (3) invalid cure responses received, 46 were not responded to (five [5] of which have response deadlines that have yet to expire), two (2) valid responses, five (5) cures have not yet been responded, and seven (7) responses that were redacted upon receipt of complete and valid claim submissions from the same Class Members. September 15, 2023 is the last date by which a timely Claim Form Cure letter response could potentially be received.

16. Currently, 1,664 claims or 94.89% of the forms received have been deemed valid, 152 invalid, and five (5) pending completion of the cure process. September 15, 2023 is the last

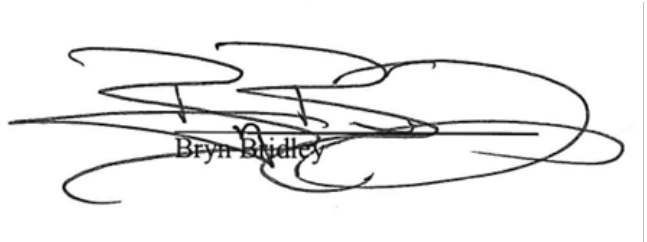
date by which a timely Claim Form Cure letter response could potentially be received. The 1,664 valid claims include 1,020 instances of lost time payments, 1,627 cash payments, and 11 out-of-pocket expense payments. To date, the 1,020 instances of lost time payments claim a total settlement value of \$92,875 and the 11 out-of-pocket expense payments total \$2,590.57.

17. The 152 invalid claims include: 27 invalid duplicates, 101 invalid fraudulent submissions from non-Class Members, eight (8) claim submissions that were instead treated as a Cures to resolve existing deficient claims, 11 completely invalid claims due to lack of Cure letter responses, one (1) claim withdrawal request, and three (4) untimely submissions.

VI. ADMINISTRATION COSTS

18. The cost of notice and administration for this Settlement are estimated to be approximately \$45,800.

I declare under penalty of perjury under the laws of the state of Georgia and the United States that the foregoing is true and correct and executed on this the 7th day of September 2023 in Mendota Heights, Minnesota.



Bryn Bradley

EXHIBIT A

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Merrick B. Garland
Attorney General of the United States
US Department of Justice
950 Pennsylvania Avenue NW
Washington DC 20530-0001

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

This notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. There is no settlement or other agreement contemporaneously made between class counsel and counsel for Defendant. The terms of the proposed class-action settlement are stated in the Settlement Agreement.

The enclosed CD-ROM, the contents of which are identified below, includes all materials required under the statute.

Contents of Enclosed CD-ROM

1. Class Action Complaint (Attachment 1)
2. Settlement Agreement and Release (Attachment 2), which includes the:
 - a. Claim Form (Exhibit A)
 - b. Long Form Notice of Proposed Class Action Settlement (Exhibit B)
 - c. [Proposed] Order Granting Preliminary Approval of Class Action Settlement (Exhibit C), and
 - d. Postcard Notice of Class Action Settlement (Exhibit D)
3. [Proposed] Order Granting Preliminary Approval of Class Action Settlement (Attachment 3)
4. Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and Preliminary Certification of Settlement Class (Attachment 4)

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Office of the Attorney General
March 24, 2023
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5. Plaintiff's Memorandum of Law in Support of Her Unopposed Motion for Preliminary Approval of Class Action Settlement and Preliminary Certification of Settlement Class (Attachment 5)
6. Declaration of Terence R. Coates in Support of Preliminary Approval of Class Action Settlement (Attachment 6)
7. Declaration of Christopher Longley on Adequacy of Notice Plan (Attachment 7)
8. A breakdown of the estimated Class Members by state of residence (Attachment 8). This breakdown will allow the respective state officials to estimate the proportionate share of claims by members of each official's state.

If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Steve Marshall
Alabama Attorney General
501 Washington Ave
PO Box 300152
Montgomery AL 36130-0152

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March 24, 2023

Via U.S. Priority Mail

Treg Taylor
Alaska Attorney General
1031 W. 4th Avenue
Suite 200
Anchorage AK 99501-1994

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Kris Mayes
Arizona Attorney General
2005 N Central Avenue
Phoenix AZ 85004-2926

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Tim Griffin
Arkansas Attorney General
323 Center Street
Suite 200
Little Rock AR 72201-2610

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March 24, 2023

Via U.S. Priority Mail

Rob Bonta
Office of the California Attorney General
CAFA Coordinator- Consumer Protection
455 Golden Gate Ave, Suite 11000
San Francisco CA 94102

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March 24, 2023

Via U.S. Priority Mail

Phil Weiser
Colorado Attorney General
Ralph L. Carr Judicial Building
1300 Broadway, 10th Floor
Denver CO 80203

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Via U.S. Priority Mail

William Tong
Office of the Connecticut Attorney General
165 Capitol Avenue
Hartford CT 06106

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

This notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. There is no settlement or other agreement contemporaneously made between class counsel and counsel for Defendant. The terms of the proposed class-action settlement are stated in the Settlement Agreement.

The enclosed CD-ROM, the contents of which are identified below, includes all materials required under the statute.

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2. Settlement Agreement and Release (Attachment 2), which includes the:
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 - b. Long Form Notice of Proposed Class Action Settlement (Exhibit B)
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4. Plaintiff's Unopposed Motion for Preliminary Approval of Class Action Settlement and Preliminary Certification of Settlement Class (Attachment 4)

Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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8. A breakdown of the estimated Class Members by state of residence (Attachment 8). This breakdown will allow the respective state officials to estimate the proportionate share of claims by members of each official's state.

If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Kathy Jennings
Delaware Attorney General
Carvel State Building
820 N French St
Wilmington DE 19801

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Brian Schwalb
District of Columbia Attorney General
400 6th Street NW
Washington DC 20001

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Ashley Moody
Office of the Florida Attorney General
PL-01 The Capitol
Tallahassee FL 32399-1050

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Chris Carr
Georgia Attorney General
40 Capital Square SW
Atlanta GA 30334

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Anne E. Lopez
Department of the Hawaii Attorney General
425 Queen Street
Honolulu HI 96813

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Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Enclosure - CD ROM

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STE 240
Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Raul Labrador
Office of the Idaho Attorney General
700 W Jefferson Street Suite 210
PO Box 83720
Boise ID 83720-0010

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Kwame Raoul
Illinois Attorney General
100 West Randolph Street
Chicago IL 60601

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March 24, 2023

Via U.S. Priority Mail

Todd Rokita
Office of the Indiana Attorney General
Indiana Government Center South
302 W Washington St 5th Floor
Indianapolis IN 46204

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Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Brenna Bird
Office of the Iowa Attorney General
Hoover State Office Building
1305 E Walnut Street
Des Moines IA 50319

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United States District Court, Northern District of Georgia
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Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Kris Kobach
Kansas Attorney General
120 SW 10th Ave 2nd Floor
Topeka KS 66612

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If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Daniel Cameron
Office of the Kentucky Attorney General
700 Capital Avenue
Suite 118
Frankfort KY 40601-3449

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Mendota Heights, MN 551201-844-728-8428
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March 24, 2023

Via U.S. Priority Mail

Jeff Landry
Louisiana Attorney General
PO Box 94005
Baton Rouge LA 70804

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Aaron Frey
Office of the Maine Attorney General
6 State House Station
Augusta ME 04333

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Anthony G. Brown
Maryland Attorney General
44 North Potomac Street
Suite 104
Hagerstown MD 21740

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Andrea Campbell
Office of the Massachusetts Attorney General
ATTN: CAFA Coordinator/General Counsel's Office
One Ashburton Place
Boston MA 02108-1518

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Office of the Claims Administrator

Enclosure - CD ROM

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Dana Nessel
Michigan Attorney General
G. Mennen Williams Building 525 W Ottawa Street
PO Box 30212
Lansing MI 48909

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Keith Ellison
Office of the Minnesota Attorney General
445 Minnesota Street
Suite 1400
St. Paul MN 55101-2131

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Office of the Claims Administrator

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**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Lynn Fitch
Mississippi Attorney General
PO Box 220
Jackson MS 39205

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Andrew Bailey
Missouri Attorney General
Supreme Court Building 207 W High St
PO Box 899
Jefferson City MO 65102

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No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Austin Knudsen
Office of the Montana Attorney General
215 N Sanders St
Helena MT 59601

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Doug Peterson
Nebraska Attorney General
2115 State Capitol
PO Box 98920
Lincoln NE 68509-8920

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Abrams v. The Savannah College of Art and Design, Inc.
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No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

Page 2

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If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Aaron D. Ford
Nevada Attorney General
100 North Carson Street
Carson City NV 89701

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

John Formella
Office of the New Hampshire Attorney General
33 Capitol Street
Concord NH 03301

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Matthew J. Platkin
New Jersey Attorney General
25 Market Street
PO Box 081
Trenton NJ 08625-0081

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Letitia James
Office of the New York Attorney General
Office of the Attorney General
28 Liberty Street
New York NY 10005

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Josh Stein
North Carolina Attorney General
9001 Mail Service Center
Raleigh NC 27699-9001

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

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STE 240
Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Drew Wrigley
North Dakota Attorney General
600 E Boulevard Avenue Department
Bismark ND 58505

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Office of the Claims Administrator

Enclosure - CD ROM

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Dave Yost
Ohio Attorney General
30 E Broad St 14th Floor
Columbus OH 43215

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Gentner Drummond
Oklahoma Attorney General
313 NE 21st Street
Oklahoma City OK 73105

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No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

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Office of the Claims Administrator

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**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Ellen F. Rosenblum
Oregon Attorney General
Oregon Department of Justice
1162 Court Street NE
Salem OR 97301-4096

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Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM



March 24, 2023

Via U.S. Priority Mail

Michelle A. Henry
Pennsylvania Office of Attorney General
16th Floor, Strawberry Square
Harrisburg PA 17120

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Peter F. Neronha
Rhode Island Office of the Attorney General
150 South Main Street
Providence RI 02903

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No. 1:22-cv-04297-LMM

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Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

This notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. There is no settlement or other agreement contemporaneously made between class counsel and counsel for Defendant. The terms of the proposed class-action settlement are stated in the Settlement Agreement.

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

Page 2

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8. A breakdown of the estimated Class Members by state of residence (Attachment 8). This breakdown will allow the respective state officials to estimate the proportionate share of claims by members of each official's state.

If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Alan Wilson
South Carolina Attorney General
The Honorable Alan Wilson
PO Box 11549
Columbia SC 29211

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Marty Jackley
South Dakota Attorney General
1302 E Hwy 14
Suite 1
Pierre SD 57501-8501

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Jonathan Skrmetti
Tennessee Attorney General & Reporter
Office of the Attorney General and Reporter
PO Box 20207
Nashville TN 37202-0207

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Ken Paxton
Office of the Texas Attorney General
PO Box 12548
Austin TX 78711-2548

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Sean Reyes
Office of the Utah Attorney General
PO Box 142320
Salt Lake City UT 84114-2320

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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STE 240
Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Charity R. Clark
Vermont Attorney General
109 State Street
Montpelier VT 05609-1001

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Jason Miyares
Virginia Attorney General
202 North 9th Street
Richmond VA 23219

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Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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STE 240
Mendota Heights, MN 551201-844-728-8428
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www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Bob Ferguson
Washington Attorney General
1125 Washington Street SE
PO Box 40100
Olympia WA 98504-0100

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Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Office of the Attorney General
March 24, 2023
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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Patrick Morrissey
West Virginia Attorney General
1900 Kanawha Blvd E
Rm 1, Rm E-26 State Capitol Complex
Chareleston WV 25305

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

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March 24, 2023

Via U.S. Priority Mail

Josh Kaul
Wisconsin Attorney General
Wisconsin Department of Justice
PO Box 7857
Madison WI 53707-7857

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

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6. Declaration of Terence R. Coates in Support of Preliminary Approval of Class Action Settlement (Attachment 6)
7. Declaration of Christopher Longley on Adequacy of Notice Plan (Attachment 7)
8. A breakdown of the estimated Class Members by state of residence (Attachment 8). This breakdown will allow the respective state officials to estimate the proportionate share of claims by members of each official's state.

If you are unable to access any of the information included on the enclosed CD, or if you have any questions regarding this notice, the proposed settlement, or the enclosed materials, please kindly contact Counsel for Defendant – Josh Becker, Shook, Hardy & Bacon L.L.P. by telephone at 1-470-867-6010 or by email to jbecker@shb.com.

Sincerely,

Office of the Claims Administrator

Enclosure - CD ROM

**ATTICUS**1250 Northland Drive
STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Bridget Hill
Wyoming Attorney General
109 State Capitol
200 W 24th Street
Cheyenne WY 82002

Re: **Class Action Fairness Act Notice**
Abrams v. The Savannah College of Art and Design, Inc.
United States District Court, Northern District of Georgia
No. 1:22-cv-04297-LMM

Dear Sir or Madam:

Atticus Administration, LLC has been retained as the third-party Settlement Administrator in the above-referenced class action lawsuit (the "Litigation") pending in the United States District Court for the Northern District of Georgia. The parties have proposed to settle the claims asserted in the Litigation according to the terms of a settlement agreement which was filed with the Court on March 15, 2023.

This notice of a proposed settlement is being provided to you in accordance with the Class Action Fairness Act, 28 U.S.C. § 1715. There is no settlement or other agreement contemporaneously made between class counsel and counsel for Defendant. The terms of the proposed class-action settlement are stated in the Settlement Agreement.

The enclosed CD-ROM, the contents of which are identified below, includes all materials required under the statute.

Contents of Enclosed CD-ROM

1. Class Action Complaint (Attachment 1)
2. Settlement Agreement and Release (Attachment 2), which includes the:
 - a. Claim Form (Exhibit A)
 - b. Long Form Notice of Proposed Class Action Settlement (Exhibit B)
 - c. [Proposed] Order Granting Preliminary Approval of Class Action Settlement (Exhibit C), and
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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice
Office of the Attorney General
March 24, 2023
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STE 240
Mendota Heights, MN 551201-844-728-8428
info@atticusadmin.com
www.atticusadmin.com

March 24, 2023

Via U.S. Priority Mail

Domingo Emanuelli Hernandez
Puerto Rico Secretary of Justice
Apartado 9020192
San Juan PR 00902-0192

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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March 24, 2023

Via U.S. Priority Mail

Shook Hardy & Bacon L.L.P.
1230 Peachtree St.
Suite 1200
Atlanta GA 30309

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Abrams v. The Savannah College of Art and Design, Inc. CAFA Notice

Office of the Attorney General

March 24, 2023

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Office of the Claims Administrator

Enclosure - CD ROM

EXHIBIT B

Abrams v. The Savannah College of Art and Design, Inc.
c/o Settlement Administrator
PO Box 64053
St. Paul, MN 55164

NOTICE OF CLASS ACTION SETTLEMENT

If you received a notice of a data security incident from The Savannah College of Art and Design, Inc., you are entitled to submit a claim for monetary compensation under a class action settlement.

www.savannahcollegedatasettlement.com

<<Barcode>>

Class Member ID: <<claimant ID>>

<<FirstName>> <<LastName>>

<<BusinessName>>

<<Address>>

<<Address2>>

<<City>>, <<ST>> <<Zip>>-<<zip4>>

WHO IS A CLASS MEMBER?

Case 1:22-cv-04297-LMM Document 20-3 Filed 09/08/23 Page 116 of 152

In the lawsuit *Atticus Administration, LLC v. The Savannah College of Art & Design, Inc.*, No. 1:22-cv-04297-LMM (N.D. Georgia), you are a settlement Class Member if your personal information was potentially compromised as a result of the cyber-attack that The Savannah College of Art & Design, Inc. ("SCAD") experienced in August 2022 (the "Settlement Class").

WHAT ARE THE SETTLEMENT BENEFITS AND TERMS?

Under the Settlement, SCAD has agreed to pay \$375,000 into a Settlement Fund that will be distributed to Settlement Class Members who submit valid Claims, after deducting Class Counsel's attorneys' fees and expenses and settlement administration notice and administration costs, if such awards are approved by the Court. All Settlement Class Members may submit Claims to receive cash payments. Settlement Class Members who believe they suffered out-of-pocket expenses as a result of the Data Security Incident may claim up to \$5,000 (subject to *pro rata* adjustment) for the reimbursement of sufficiently documented expenses. Settlement Class Members who spent time reviewing their personal information as a result of the Data Security Incident may claim up to \$125. An estimated \$50 *pro rata* cash payment may be made to claimants if there is a remaining balance in the Settlement Fund after payments for valid Claims, settlement administration costs and expenses, and attorneys' fees and expenses. These cash payment amounts may not be \$50, as they will be adjusted upwards or downwards depending on the amount of valid Claims. More information about the types of Claims and how to file them is available at www.savannahcollegedatasettlement.com ("Settlement Website").

WHAT ARE YOUR RIGHTS AND OPTIONS?

Submit a Claim Form. To qualify for a cash payment, you must timely mail a Claim Form that is attached to this notice or timely complete and submit a Claim Form online at www.savannahcollegedatasettlement.com. Your Claim Form must be postmarked or submitted online no later than **August 8, 2023**. Atticus Administration, LLC is the Settlement Administrator.

Opt Out. You may exclude yourself from the Settlement and retain your ability to sue SCAD on your own by mailing a written request for exclusion

to the Settlement Administrator that is postmarked no later than **July 10, 2023**. If you do not exclude yourself, then you will be bound by the Settlement and give up your right to sue regarding the Released Claims.

Object. If you do not exclude yourself, you have the right to object to the Settlement. Written objections must be signed, postmarked no later than **July 10, 2023**, and provide the reasons for the objection. Please visit www.savannahcollegedatasettlement.com for more details.

Do Nothing. If you do nothing, you will not receive a Settlement payment and will lose the right to sue regarding the released claims. You will be bound by the Court's decision because this is a conditionally certified class action.

Attend the Final Approval Hearing. The Court will hold a **Final Approval Hearing at 10 a.m. on September 19, 2023**, to determine if the Settlement is fair, reasonable, and adequate. All persons who timely object to the Settlement may appear at the Final Approval Hearing. **Who are the attorneys for the Plaintiffs and the proposed Class?** The Court appointed Terence R. Coates, Justin C. Walker, and Dylan J. Gould of Markovits, Stock & DeMarco, LLC, and N. Nickolas Jackson of The Finley Firm, P.C., as Class Counsel to represent the Settlement Class. **Do I have any obligation to pay attorneys' fees or expenses?** No. The attorneys' fees and expenses will be paid exclusively from the Settlement Fund as awarded and approved by the Court. The attorneys' fees will be in an amount of up to \$125,000 and the expenses will not exceed \$10,000. The Fee and Expense Application will be posted on the Settlement Website after it is filed with the Court. **Who is the Judge overseeing this settlement?** Judge Leigh Martin May of the United States District Court for the Northern District of Georgia. **Where may I locate a copy of the settlement agreement, learn more about the case, or learn more about submitting a Claim?** www.savannahcollegedatasettlement.com.

*** Please note that if you wish to submit a claim for compensation for out-of-pocket losses on the attached Claim Form, you will likely need to submit your claim online so you may attach all information necessary to support your request for payment. A longer version of the Claim Form may be accessed on the Settlement Website. **This Notice is a summary of the proposed Settlement.**

POSTAGE
REQUIRED

Abrams v. The Savannah College of Art and Design, Inc.
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

CLAIM FORM

Claims must be postmarked no later than August 8, 2023. You may also submit a Claim Form online no later than August 8, 2023.

NAME: _____ ADDRESS: _____

Monetary Compensation - You may file claims for one or more of the benefits in Sections 1, 2 and 3 below.

1. **Pro Rata Cash Payment of \$50:** Would you like to receive a *pro rata* cash payment of \$50? (circle one) Yes No
If you are a Settlement Class Member, you may receive a \$50 cash payment, which may be increased or decreased *pro rata* from funds remaining in the Settlement Fund after all claims are submitted and deductions are made from the Settlement Fund.
2. **Lost Time:** Members of the Class may submit a Claim for Lost Time at a rate of \$25/hour if at least one hour of time was spent in response to the Data Security Incident on remedying fraud, identity theft, or other alleged misuse of personal information caused by the Data Security Incident, or time spent on preventative and remedial measures to protect personal information caused by the Data Security Incident. You may claim up to 5 hours of lost time at \$25 per hour (\$125 maximum) under this settlement benefit.

I spent (circle one if applicable) 1 2 3 4 5 hours

3. **Out-of-Pocket Losses:** I am submitting a claim for out-of-pocket monetary expenses in the amount of \$_____ (not more than \$5,000) on account of out-of-pocket expenses and/losses I incurred as a result of the Data Security Incident. I understand that I am required to provide third-party documentation to support my claim for Out-of-Pocket Losses, such as providing copies of any receipts, bank statements, or other documentation supporting my claim. I understand that "self-prepared" documents are insufficient to receive payment. I understand the Settlement Administrator may contact me for additional information before processing my claim. I understand that if I lack information supporting my claim, then I will likely not receive compensation for this Settlement benefit. I understand any monetary compensation I may receive under the Settlement for out-of-pocket monetary losses is capped at \$5,000.

By signing my name below, I swear and affirm that the information included on this Claim Form is true and accurate, and that I am completing this claim form to the best of my personal knowledge.

_____ (Signature) Class Member ID: <<Claimant ID>>

EXHIBIT C

Claimant ID:
Last Name:Administration

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF GEORGIA**

Abrams v. The Savannah College of Art & Design, Inc., No. 1:22-cv-04297-LMM
A court has authorized this Notice. This is not a solicitation from a lawyer.

**If You Were Subject to The Savannah College of Art and Design Data Security Incident
and Previously Received a Notice Letter Notifying You of the Data Security Incident,
You Could be Eligible for a Payment from a Class Action Settlement**

- You may be eligible to receive a payment from a proposed \$375,000 non-reversionary class action settlement (the “Settlement Fund”).
- The class action lawsuit concerns a data security incident that occurred in or around August 2022 (the “Data Security Incident”) involving The Savannah College of Art and Design, Inc. (“SCAD” or “Defendant”) in which it was determined that an unauthorized third party may have gained access to certain SCAD files containing current and former students’ and certain employees’ sensitive personal information, including names, Social Security numbers, and dates of birth (“Private Information”). SCAD denies any wrongdoing and denies that it has any liability but has agreed to settle the lawsuit on a class wide basis.
- To be eligible to make a claim, you must have received a notice letter of the SCAD Data Security Incident that occurred in August 2022.
- Eligible claimants under the Settlement Agreement will be eligible to receive one, two and/or three of the following Settlement benefits:
 - **Out-of-Pocket Losses:** Reimbursement for the actual amount of unreimbursed out-of-pocket losses or expenses up to \$5,000, with supporting documentation of the monetary losses or expenses;
 - **Lost Time:** Compensation of up to \$125 for time spent dealing with issues related to the Data Security Incident, including but not limited to reviewing your accounts, enrolling in credit protection services, or responding to fraud, identity theft, or other alleged misuse of your personal information that is fairly traceable to the Data Security Incident; and/or,
 - **Pro Rata Cash Payment:** \$50 cash payment from the Settlement Fund that will be increased or decreased pro rata depending on the amount remaining in the Settlement Fund after allocation of the Settlement Fund for reimbursement of documented Out-of-Pocket Losses, payments for lost time, attorneys’ fees and expenses, and Notice and Administrative Expenses.
- For more information or to submit a Claim Form visit www.savannahcollegedatasettlement.com or call 1-888-230-9714 Monday through Friday, between 8:00 a.m. and 4:00 p.m. CDT.
- **Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive payment.	Submitted or Postmarked on or Before August 8, 2023.
Exclude Yourself By Opting Out of the Class	Receive no payment. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant	Submitted or Postmarked on or Before July 10, 2023.

	for the same claims if you are a Class Member.	
Object to the Settlement and/or Attend the Fairness Hearing	You can write to the Court about why you agree or disagree with the Settlement. The Court cannot order a different Settlement. You can also ask to speak to the Court at the Final Approval Hearing on September 19, 2023, about the fairness of the Settlement, with or without your own attorney.	Received on or Before July 10, 2023.
Do Nothing	Receive no payment. Give up rights if you are a Class Member.	No Deadline.

- Your rights and options as a Class Member – and the deadlines to exercise your rights – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Payments to class members will be made if the Court approves the Settlement and after any possible appeals are resolved.

BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give “final approval” to the Settlement. This Notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Leigh Martin May of the United States District Court for the Northern District of Georgia is overseeing this case captioned as Abrams v. The Savannah College of Art and Design, Inc., No. 1:22-cv-04297-LMM. The person who brought the lawsuit is called the Plaintiff, Laura Abrams. The entity being sued, The Savannah College of Art and Design, Inc., is called the Defendant.

2. What is this lawsuit about?

The lawsuit claims that Defendant was responsible for the Data Security Incident and asserts claims such as: negligence; breach of contract; unjust enrichment; invasion of privacy; and violation of O.C.G.A. Section 13-6-11.

Defendant denies these claims and says it did not do anything wrong. No court or other judicial entity has made any judgment or other determination that Defendant has any liability for these claims or did anything wrong.

3. Why is this lawsuit a class action?

In a class action, one or more people called class representatives or representative plaintiffs sue on behalf of all people who have similar claims. Together, all of these people are called a class, and the individuals are called class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to members of the Settlement Class (“Settlement Class Members”). The Class Representative appointed to represent the Settlement Class and the attorneys for the Settlement Class (“Class Counsel,” see Question 18) think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are affected by the Settlement and potentially a member of the Settlement Class if you reside in the United States and your Private Information may have been compromised in connection with the Data Security Incident, including if you were mailed a notification by or on behalf of SCAD regarding the Data Security Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Specifically excluded from the Settlement Class are (1) the judge presiding over the class action lawsuit and her direct family members; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, and employees; and (3) Settlement Class Members who submit a valid request to be excluded from the Settlement.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 1-888-230-9714 with questions. You may also write with questions to:

Abrams v. The Savannah College of Art and Design, Inc.
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
www.savannahcollegedatasettlement.com
Email: savannahcollegedatasettlement@atticusadmin.com

THE SETTLEMENT BENEFITS – WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides that Defendant will fund the following payments up to a total of \$375,000: (a) \$25 per hour, up to a total of \$125, for Settlement Class Members who attest that the time claimed was actually spent as a result of the Data Security Incident; (b) up to \$5,000 for reimbursement of your documented Out-of-Pocket Losses reasonably traceable to the Data Security Incident; and (c) a pro rata \$50 payment, subject to adjustment as set forth below.

The \$50 pro rata payment will be dispersed after the distribution of attorneys' fees, Class Counsel's litigation expenses, Notice and Administrative Expenses, and other Settlement benefits to claimants. The other Settlement benefits are also subject to pro rata reduction as needed in the event that the total claims exceed the \$375,000 cap on payments to be made by Defendant, and payments may also be increased on a pro rata basis until the Settlement Fund is distributed. Payment of (1) attorneys' fees, costs, and expenses (see Question 19) and (2) the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement Fund.

Also, as part of the Settlement, Defendant either has undertaken or will undertake certain reasonable steps to further secure its systems and environments.

8. What payments are available for reimbursement under the Settlement?

Settlement Class Members who submit a claim are eligible to receive:

a) Reimbursement of actual, documented, unreimbursed Out-of-Pocket Losses resulting from the Data Security Incident (up to \$5,000 in total), such as the following incurred on or after August 22, 2022:

- any costs incurred from credit monitoring services or ordering copies of your credit report;
- late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, and/or card cancellation or replacement fees;
- late fees from transactions with third parties that were delayed due to fraud or card replacement;
- unauthorized charges on credit, debit, or other payment cards that were not reimbursed;
- parking expenses or other transportation expenses for trips to a financial institution to address fraudulent charges or receive a replacement payment card;
- costs incurred obtaining credit freezes; and
- other expenses that are reasonably attributable to the Data Security Incident that were not reimbursed.

b) Compensation for time spent (lost time) remedying issues related to the Data Security Incident, up to 5 hours at \$25.00/hour for time spent in response to the Data Security Incident for a total amount of up to \$125.

c) A potential residual cash payment of the remainder funds, which is estimated to be \$50 but may adjusted upward or downward pro rata based on how many other claims are made.

HOW DO YOU SUBMIT A CLAIM?

9. How do I get a benefit?

To receive a benefit under the Settlement, you must complete and submit a claim for that benefit (a “Claim”). Every Claim must be made on a form (“Claim Form”) available at www.savannahcollegedatasettlement.com or by calling 1-888-230-9714. Claim Forms will also be sent to Settlement Class Members as part of the postcard Notice and tear-off Claim Form that will be mailed to Settlement Class Members. Read the instructions carefully, fill out the Claim Form, provide the required documentation, and submit it according to the instructions on the Claim Form.

10. How will claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is valid. The Settlement Administrator may require additional information. If you do not provide the additional information in a timely manner then the Claim will be considered invalid and will not be paid.

11. When will I get my payment?

The Court will hold a Final Approval Hearing on September 19, 2023, at 10 a.m. ET to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving those can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Please be patient.

WHAT DOES DEFENDANT GET?

12. What am I giving up as part of the Settlement?

The Defendant gets a release from all claims covered by this Settlement. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant and other persons (“Released Parties”) as to all claims (“Released Claims”) arising out of or relating to the Data Security Incident. This release is described in the Settlement Agreement, which is available at www.savannahcollegedatasettlement.com. If you have any questions you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of this Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as “opting out” of the Settlement Class.

13. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement, but you will not be bound by any judgment in this case.

14. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant (and any other Released Parties) for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you want to exclude yourself, then do not submit a Claim Form to ask for any benefit under the Settlement.

15. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded or opt-out from the Settlement in *Abrams v. The Savannah College of Art and Design, Inc.*, No. 1:22-cv-04297-LMM (N.D. Georgia). The letter must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature or the original signature of a person authorized by law to act on your behalf; and (c) state unequivocally your intent to be excluded from the Settlement. You must mail your exclusion request postmarked by July 10, 2023, to:

Abrams v. The Savannah College of Art and Design, Inc.
Attn: Exclusion Request
PO Box 64053
St. Paul, MN 55164

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I do not like the Settlement?

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. The Court will consider your views in its decision on whether to approve the Settlement. The Court can only approve or deny the Settlement and cannot change its terms. To object, you must mail your objection to the Clerk of the Court and the Settlement Administrator, at the mailing addresses listed below, postmarked by no later than the Objection Deadline, July 10, 2023:

Clerk of the Court
Richard B. Russell Federal Building
2211 United States Courthouse
75 Ted Turner Drive, SW
Atlanta, GA 30303-3309

Settlement Administrator
Abrams v. The Savannah College of Art and Design, Inc.
C/O Atticus Administration, LLC
PO Box 64053
St. Paul, MN 55164

Your objection must be written and must include all of the following: (1) the name of the proceedings; (2) the Settlement Class Member's full name, current mailing address, and telephone number; (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection; (4) the identity of any attorneys representing the objector; (5) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; (6) a statement identifying all class action settlements objected to by the Settlement Class Member in the previous five years; and (7) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

17. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, then you have no basis to object because you are no longer a member of the Settlement Class and the case no longer affects you. If you submit both a valid objection and a valid request to be excluded, you will be deemed to have only submitted the request to be excluded.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Terence R. Coates, Dylan J. Gould, and Justin C. Walker of Markovits, Stock & DeMarco, LLC, 119 E. Court Street, Suite 530, Cincinnati, OH 45202 and N. Nickolas Jackson, The Finley Firm, P.C., 3535 Piedmont Road, Building 14, Suite 230, Atlanta, GA 30305 as Class Counsel to represent the Class. If you want to be represented by your own lawyer, then you may hire one at your own expense.

19. How will the lawyers be paid?

Class Counsel will ask the Court for an award for attorneys' fees up to \$125,000, plus litigation expenses not to exceed \$10,000. Defendant has agreed not to object to any award of attorneys' fees, costs, and expenses up to those amounts, to the extent they are approved by the Court. This payment for any attorneys' fees and expenses to Class Counsel will be made out of the Settlement Fund. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Any award for attorneys' fees and expenses for Class Counsel must be approved by the Court. The Court may award less than the amount requested. Class Counsel's papers in support of final approval of the Settlement will be filed no later than September 5, 2023, and their application for attorneys' fees, costs, and expenses will be filed no later than June 26, 2023, and will be posted on the settlement website.

THE COURT'S FINAL APPROVAL HEARING**20. When and where will the Court decide whether to approve the Settlement?**

The Court will hold a Final Approval Hearing at **10 a.m. EDT on September 19, 2023**, at 2167 Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Courtroom 2107 or by remote or virtual means as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, then the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees and reasonable costs and expenses. After the hearing the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking www.savannahcollegedatasettlement.com or calling 1-888-230-9714.

21. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 16, the Court will consider it.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the final fairness hearing. To do so, you must file an objection according to the instructions in Question 16, including all the information required. Your objection must be **mailed** to the Clerk of the Court and Settlement Administrator postmarked no later than July 10, 2023.

IF YOU DO NOTHING**23. What happens if I do nothing?**

If you do nothing you will not get any money from this Settlement. If the Settlement is granted final approval and the judgment becomes final, then you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant and the other Released Parties based on any of the Released Claims related to the Data Security Incident, ever again.

GETTING MORE INFORMATION**24. How do I get more information?**

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at www.savannahcollegedatasettlement.com. You may also call the Settlement Administrator with questions or request a Claim Form at 1-888-230-9714.

This Notice is approved by the United States District Court for the Northern District of Georgia. **DO NOT CONTACT THE COURT DIRECTLY IF YOU HAVE QUESTIONS ABOUT THE SETTLEMENT.** Please contact the Settlement Administrator or Class Counsel if you have any questions about the Settlement.

Atticus Administration | PO BOX 64053, ST PAUL, MN 55164

[Unsubscribe thebodyshopfacta@atticusadmin.com](mailto:Unsubscribe_thebodyshopfacta@atticusadmin.com)

[Constant Contact Data Notice](#)

Sent by savannahcollegedatasettlement@atticusadmin.com

EXHIBIT D

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF GEORGIA**

***Abrams v. The Savannah College of Art & Design, Inc.*, No. 1:22-cv-04297-LMM
A court has authorized this Notice. This is not a solicitation from a lawyer.**

**If You Were Subject to The Savannah College of Art and Design Data Security Incident and
Previously Received a Notice Letter Notifying You of the Data Security Incident,
You Could be Eligible for a Payment from a Class Action Settlement**

- You may be eligible to receive a payment from a proposed \$375,000 non-reversionary class action settlement (the “Settlement Fund”).
- The class action lawsuit concerns a data security incident that occurred in or around August 2022 (the “Data Security Incident”) involving The Savannah College of Art and Design, Inc. (“SCAD” or “Defendant”) in which it was determined that an unauthorized third party may have gained access to certain SCAD files containing current and former students’ and certain employees’ sensitive personal information, including names, Social Security numbers, and dates of birth (“Private Information”). SCAD denies any wrongdoing and denies that it has any liability but has agreed to settle the lawsuit on a class wide basis.
- To be eligible to make a claim, you must have received a notice letter of the SCAD Data Security Incident that occurred in August 2022.
- Eligible claimants under the Settlement Agreement will be eligible to receive one, two and/or three of the following Settlement benefits:
 - ❖ **Out-of-Pocket Losses:** Reimbursement for the actual amount of unreimbursed out-of-pocket losses or expenses up to \$5,000, with supporting documentation of the monetary losses or expenses;
 - ❖ **Lost Time:** Compensation of up to \$125 for time spent dealing with issues related to the Data Security Incident, including but not limited to reviewing your accounts, enrolling in credit protection services, or responding to fraud, identity theft, or other alleged misuse of your personal information that is fairly traceable to the Data Security Incident; and/or,
 - ❖ **Pro Rata Cash Payment:** \$50 cash payment from the Settlement Fund that will be increased or decreased pro rata depending on the amount remaining in the Settlement Fund after allocation of the Settlement Fund for reimbursement of documented Out-of-Pocket Losses, payments for lost time, attorneys’ fees and expenses, and Notice and Administrative Expenses.
- For more information or to submit a Claim Form visit www.savannahcollegedatasettlement.com or call 1-888-230-9714 Monday through Friday, between 8:00 a.m. and 4:00 p.m. C.S.T.
- **Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive payment.	Submitted or Postmarked on or Before August 8, 2023 .
Exclude Yourself By Opting Out of the Class	Receive no payment. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant for the same claims if you are a Class Member.	Submitted or Postmarked on or Before July 10, 2023 .
Object to the Settlement and/or Attend the Fairness Hearing	You can write to the Court about why you agree or disagree with the Settlement. The Court cannot order a different Settlement. You can also ask to speak to the Court at the Final Approval Hearing on September 19, 2023 , about the fairness of the Settlement, with or without your own attorney.	Received on or Before July 10, 2023 .
Do Nothing	Receive no payment. Give up rights if you are a Class Member.	No Deadline.

- Your rights and options as a Class Member – and the deadlines to exercise your rights – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Payments to class members will be made if the Court approves the Settlement and after any possible appeals are resolved.

What This Notice Contains

Basic Information.....	3-4
Who is in the Settlement.....	4
The Settlement Benefits—What You Get if You Qualify.....	4-5
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BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give “final approval” to the Settlement. This Notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Leigh Martin May of the United States District Court for the Northern District of Georgia is overseeing this case captioned as *Abrams v. The Savannah College of Art and Design, Inc.*, No. 1:22-cv-04297-LMM. The person who brought the lawsuit is called the Plaintiff, Laura Abrams. The entity being sued, The Savannah College of Art and Design, Inc., is called the Defendant.

2. What is this lawsuit about?

The lawsuit claims that Defendant was responsible for the Data Security Incident and asserts claims such as: negligence; breach of contract; unjust enrichment; invasion of privacy; and violation of O.C.G.A. Section 13-6-11.

Defendant denies these claims and says it did not do anything wrong. No court or other judicial entity has made any judgment or other determination that Defendant has any liability for these claims or did anything wrong.

3. Why is this lawsuit a class action?

In a class action, one or more people called class representatives or representative plaintiffs sue on behalf of all people who have similar claims. Together, all of these people are called a class, and the individuals are called class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to members of the Settlement Class (“Settlement Class Members”). The Class Representative appointed to represent the Settlement Class and the attorneys for the Settlement Class (“Class Counsel,” see Question 18) think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?**5. How do I know if I am part of the Settlement?**

You are affected by the Settlement and potentially a member of the Settlement Class if you reside in the United States and your Private Information may have been compromised in connection with the Data Security Incident, including if you were mailed a notification by or on behalf of SCAD regarding the Data Security Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Specifically excluded from the Settlement Class are (1) the judge presiding over the class action lawsuit and her direct family members; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, and employees; and (3) Settlement Class Members who submit a valid request to be excluded from the Settlement.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 1-888-230-9714 with questions. You may also write with questions to:

Abrams v. The Savannah College of Art and Design, Inc.

c/o Atticus Administration

PO Box 64053

St. Paul, MN 55164

www.savannahcollegedatasettlement.com

Email: SavannahCollegeDataSettlement@atticusadmin.com

THE SETTLEMENT BENEFITS – WHAT YOU GET IF YOU QUALIFY**7. What does the Settlement provide?**

The Settlement provides that Defendant will fund the following payments up to a total of \$375,000: (a) \$25 per hour, up to a total of \$125, for Settlement Class Members who attest that the time claimed was actually spent as a result of the Data Security Incident; (b) up to \$5,000 for reimbursement of your documented Out-of-Pocket Losses reasonably traceable to the Data Security Incident; and (c) a pro rata \$50 payment, subject to adjustment as set forth below.

The \$50 pro rata payment will be dispersed after the distribution of attorneys’ fees, Class Counsel’s litigation expenses, Notice and Administrative Expenses, and other Settlement benefits to claimants. The other Settlement benefits are also subject to pro rata reduction as needed in the event that the total claims exceed the \$375,000 cap on payments to be made by Defendant, and payments may also be increased on a pro rata basis until the Settlement Fund is distributed. Payment of (1) attorneys’ fees, costs, and expenses (see Question 19) and (2) the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement Fund.

Also, as part of the Settlement, Defendant either has undertaken or will undertake certain reasonable steps to further secure its systems and environments.

8. What payments are available for reimbursement under the Settlement?

Settlement Class Members who submit a claim are eligible to receive:

- a) Reimbursement of actual, documented, unreimbursed Out-of-Pocket Losses resulting from the Data Security Incident (up to \$5,000 in total), such as the following incurred on or after August 22, 2022:
 - any costs incurred from credit monitoring services or ordering copies of your credit report;
 - late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, and/or card cancellation or replacement fees;
 - late fees from transactions with third parties that were delayed due to fraud or card replacement;
 - unauthorized charges on credit, debit, or other payment cards that were not reimbursed;
 - parking expenses or other transportation expenses for trips to a financial institution to address fraudulent charges or receive a replacement payment card;
 - costs incurred obtaining credit freezes; and
 - other expenses that are reasonably attributable to the Data Security Incident that were not reimbursed.
- b) Compensation for time spent (lost time) remedying issues related to the Data Security Incident, up to 5 hours at \$25.00/hour for time spent in response to the Data Security Incident for a total amount of up to \$125.
- c) A potential residual cash payment of the remainder funds, which is estimated to be \$50 but may be adjusted upward or downward pro rata based on how many other claims are made.

HOW DO YOU SUBMIT A CLAIM?

9. How do I get a benefit?

To receive a benefit under the Settlement, you must complete and submit a claim for that benefit (a “Claim”). Every Claim must be made on a form (“Claim Form”) available at www.savannahcollegedatasettlement.com or by calling 1-888-230-9714. Claim Forms will also be sent to Settlement Class Members as part of the postcard Notice and tear-off Claim Form that will be mailed to Settlement Class Members. Read the instructions carefully, fill out the Claim Form, provide the required documentation, and submit it according to the instructions on the Claim Form.

10. How will claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is valid. The Settlement Administrator may require additional information. If you do not provide the additional information in a timely manner then the Claim will be considered invalid and will not be paid.

11. When will I get my payment?

The Court will hold a Final Approval Hearing on **September 19, 2023, at 10 a.m. ET** to decide

whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving those can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Please be patient.

WHAT DOES DEFENDANT GET?

12. What am I giving up as part of the Settlement?

The Defendant gets a release from all claims covered by this Settlement. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant and other persons (“Released Parties”) as to all claims (“Released Claims”) arising out of or relating to the Data Security Incident. This release is described in the Settlement Agreement, which is available at www.savannahcollegedatasettlement.com. If you have any questions you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of this Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as “opting out” of the Settlement Class.

13. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement, but you will not be bound by any judgment in this case.

14. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant (and any other Released Parties) for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you want to exclude yourself, then do not submit a Claim Form to ask for any benefit under the Settlement.

15. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded or opt-out from the Settlement in *Abrams v. The Savannah College of Art and Design, Inc.*, No. 1:22-cv-04297-LMM (N.D. Georgia). The letter must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature or the original signature of a person authorized by law to act on your behalf; and (c) state unequivocally your intent to be excluded from the Settlement. You must mail your exclusion request postmarked by **July 10, 2023**, to:

Abrams v. The Savannah College of Art and Design, Inc.
Attn: Exclusion Request
PO Box 64053
St. Paul, MN 55164

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I do not like the Settlement?

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. The Court will consider your views in its decision on whether to approve the Settlement. The Court can only approve or deny the Settlement and cannot change its terms. To object, you must mail your objection to the Clerk of the Court and the Settlement Administrator, at the mailing addresses listed below, postmarked by **no later** than the Objection Deadline, **July 10, 2023**:

Court	Settlement Administrator
Clerk of the Court Richard B. Russell Federal Building 2211 United States Courthouse 75 Ted Turner Drive, SW Atlanta, GA 30303-3309	Atticus Administration, LLC PO Box 64053 St. Paul, MN 55164

Your objection must be written and must include all of the following: (1) the name of the proceedings; (2) the Settlement Class Member's full name, current mailing address, and telephone number; (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection; (4) the identity of any attorneys representing the objector; (5) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; (6) a statement identifying all class action settlements objected to by the Settlement Class Member in the previous five years; and (7) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

17. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, then you have no basis to object because you are no longer a member of the Settlement Class and the case no longer affects you. If you submit both a valid objection and a valid request to be excluded, you will be deemed to have only submitted the request to be excluded.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Terence R. Coates, Dylan J. Gould, and Justin C. Walker of Markovits, Stock & DeMarco, LLC, 119 E. Court Street, Suite 530, Cincinnati, OH 45202 and N. Nickolas Jackson, The Finley Firm, P.C., 3535 Piedmont Road, Building 14, Suite 230, Atlanta, GA 30305 as Class Counsel to represent the Class. If you want to be represented by your own lawyer, then you may hire one at your own expense.

19. How will the lawyers be paid?

Class Counsel will ask the Court for an award for attorneys' fees up to \$125,000, plus litigation expenses not to exceed \$10,000. Defendant has agreed not to object to any award of attorneys' fees, costs, and expenses up to those amounts, to the extent they are approved by the Court. This

payment for any attorneys' fees and expenses to Class Counsel will be made out of the Settlement Fund. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Any award for attorneys' fees and expenses for Class Counsel must be approved by the Court. The Court may award less than the amount requested. Class Counsel's papers in support of final approval of the Settlement will be filed no later than **September 5, 2023**, and their application for attorneys' fees, costs, and expenses will be filed no later than **June 26, 2023**, and will be posted on the settlement website.

THE COURT'S FINAL APPROVAL HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at **10 a.m. ET on September 19, 2023**, at 2167 Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Courtroom 2107 or by remote or virtual means as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, then the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees and reasonable costs and expenses. After the hearing the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking www.savannahcollegedatasettlement.com or calling 1-888-230-9714.

21. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 16, the Court will consider it.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the final fairness hearing. To do so, you must file an objection according to the instructions in Question 16, including all the information required. Your objection must be **mailed** to the Clerk of the Court and Settlement Administrator postmarked no later than **July 10, 2023**.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing you will not get any money from this Settlement. If the Settlement is granted final approval and the judgment becomes final, then you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant and the other Released Parties based on any of the Released Claims related to the Data Security Incident, ever again.

GETTING MORE INFORMATION

24. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at www.savannahcollegedatasettlement.com. You may also call the Settlement Administrator with questions or request a Claim Form at 1-888-230-9714.

This Notice is approved by the United States District Court for the Northern District of Georgia. **DO NOT CONTACT THE COURT DIRECTLY IF YOU HAVE QUESTIONS ABOUT THE SETTLEMENT.** Please contact the Settlement Administrator or Class Counsel if you have any questions about the Settlement.

**CLAIM FORM FOR THE SAVANNAH COLLEGE OF
ART AND DESIGN DATA SECURITY INCIDENT BENEFITS**

**USE THIS FORM TO MAKE A CLAIM FOR A LOST TIME PAYMENT,
OUT-OF-POCKET LOSS PAYMENT, AND/OR PRO RATA CASH PAYMENT**

For more information, call 1-888-230-9714 or visit the website www.savannahcollegedatasettlement.com.

*Para una notificación en Español, pueda llamar 1-888-230-9714 o visitar nuestro sitio de web
www.savannahcollegedatasettlement.com.*

The DEADLINE to submit this Claim Form online (or have it postmarked for mailing) is

August 8, 2023

I. GENERAL INSTRUCTIONS

If you were notified that your private information was potentially compromised in a cybersecurity attack against The Savannah College of Art and Design, Inc., or SCAD, you are a Settlement Class Member. The event that caused your data to be lost is referred to here as the “Data Security Incident.”

The Settlement establishes a \$375,000.00 fund to compensate Settlement Class Members for their lost time and out-of-pocket losses or expenses as well as for the costs of notice and administration, and attorneys’ fees and expenses as awarded by the Court. As a Settlement Class Member, you are eligible for cash payments as reimbursement for your time and money spent in response to the Data Security Incident (such as money spent on credit monitoring), as well as for any money you lost as a result of incidents of fraud or identity theft caused by the Data Security Incident. You must fill out this Claim Form to receive these benefits. **You may submit a claim for one or more of these benefits, including that you may receive each of a lost time payment, Out-of-Pocket Loss payment, and/or pro rata cash payment.**

The benefits are as follows:

a. Lost Time Claims

You may submit a claim for reimbursement for time spent resolving issues attributable to the Data Security Incident. You will be reimbursed at \$25/hour of time spent, **up to \$125 total**. By filling out this Claim Form, you must attest to the amount of time you spent attempting to mitigate the effects of the Data Security Incident on your life. This can include, for example, time spent on the phone with banks, time spent dealing with replacement card issues or reversing fraudulent charges, time spent monitoring accounts, or time spent freezing your credit. **You do not have to include documentation of your lost time. Instead, you can swear, under penalty of perjury, to the amount of time you spent.**

b. Out-of-Pocket Losses

You are eligible to receive reimbursement for money you paid to protect yourself from the Data Security Incident, such as money spent on a credit monitoring service. You are also eligible to receive reimbursement for money you lost as a result of fraud or identity theft, if that money has not been reimbursed from another source. This includes:

- Late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, and/or card cancellation or replacement fees;
- Late fees from transactions with third parties that were delayed due to fraud or card replacement;
- Unauthorized charges on credit, debit, or other payment cards that were not reimbursed;
- Parking expenses or other transportation expenses for trips to a financial institution to address fraudulent

charges or receive a replacement payment card;

- Credit freeze fees or credit monitoring costs that were incurred on or after August 22, 2022 and that were incurred as a result of the Data Security Incident;
- Instances of verified fraud such as fraudulent bank or credit card charges, fraudulent tax filings, fraudulent opening/closing of bank or credit accounts, unemployment filings, or other fraudulent actions taken using your information from the Data Security Incident; and
- Other expenses that are reasonably attributable to the Data Security Incident that were not reimbursed.

These Out-of-Pocket Losses must be documented; you must submit copies of documents supporting your claims, such as receipts or other documentation. “Self-prepared” documents, such as handwritten receipts, will not count as documentation, but you can submit them as clarification to other, official documents.

c. \$50 Pro Rata Residual Cash Payment

After distributing funds for the claims payments set forth above to claimants, as well as attorneys’ fees, Class Counsel’s litigation expenses, and Administrative Fees, if there is any money left over, the Settlement Administrator will make pro rata settlement payments of the remaining Settlement Fund to each Settlement Class Member who submits a cash payment claim. The remaining amount of the Settlement Fund will be distributed pro rata for each Settlement Class Member who submits a claim, which may increase or decrease the \$50 cash payment amount.

Completing the Claim Form

This Claim Form may be submitted online at www.savannahcollegedatasettlement.com or completed and mailed to the address below. Please type or legibly print all requested information in blue or black ink. If submitting by U.S. mail, mail your completed Claim Form, including any supporting documentation, to:

Abrams v. The Savannah College of Art and Design, Inc.
PO Box 64053
St. Paul, MN 55164
Email: SavannahCollegeDataSettlement.com
Fax: 1-888-326-6411

II. CLAIMANT INFORMATION

The Settlement Administrator will use this information for all communications regarding this Claim Form and the Settlement. If this information changes prior to distribution of cash payments, you must notify the Settlement Administrator in writing at the address above.

Claimant Name: _____

First Name	MI	Last Name
------------	----	-----------

Street Address:

Street Address Second Line:

City: _____ State: _____ Zip Code: _____

Class Member ID: _____

If you received a Notice of this Settlement by U.S. mail, your Class Member ID is on the envelope or postcard.

If you received a Notice of this Settlement by email, your Class Member ID is in the email.

E-mail Address:

[optional] Daytime Phone Number: () -

[optional] Evening Phone Number: () -

You may submit a claim for one or more of these benefits:

1) CASH PAYMENT

Pro Rata Cash Payment: Would you like to receive a cash payment under the Settlement? **(circle one)**

Yes **No**

**** The payment under this option will originally be set at \$50; however, the value of the cash payment under this option will be increased or decreased pro rata based on the balance of the Settlement Fund after the payment of other benefits and attorneys' and settlement administrator fees and expenses.**

2) LOST TIME PAYMENT

☐ Please check this box here if you are electing to seek reimbursement for Lost Time you undertook to prevent or mitigate fraud and identity theft following the announcement of the Data Incident.

Settlement Class Members who elect to submit a Claim for Lost Time Payment may claim no more than \$125 at \$25/hour for five hours of time actually spent addressing issues arising from the Data Security Incident. If you are selecting reimbursement for Lost Time, you must fill in the blanks in this section and sign the certification below.

I, _____, declare that I suffered Lost Time. Specifically, I spent the following number of
|Name|
hours in response to the Data Incident: (circle one) 1 2 3 4 5

3) REIMBURSEMENT FOR OUT-OF-POCKET LOSSES

☐ Please check this box here if you are electing to seek reimbursement for unreimbursed **Out-of-Pocket Losses** and such claimed losses above will total no more than \$5,000.00. You must provide reasonable documentation of the claimed Out-of-Pocket Losses. Self-attested documentation will not suffice.

Making a Claim for Out-of-Pocket Expenses

In order to make a claim for Out-of-Pocket Expenses, **you must** (i) fill out the information below, or fill out a separate sheet to be submitted with this Claim Form; (ii) sign the Certification at the end of this Claim Form (section III); and (iii) include reasonable documentation supporting each claimed loss along with this Claim Form. Out-of-Pocket losses need to be deemed fairly traceable to the Data Security Incident by the Settlement Administrator based on the documentation you provide and the facts of the Data Security Incident.

Failure to meet the requirements of this section may result in your claim being rejected by the Settlement Administrator.

Out-of-Pocket Cost Type (Fill all that apply)	Approximate Date of Loss	Amount of Loss	Description of Supporting Reasonable Documentation (Identify what you are attaching and why)
<input type="checkbox"/> Unreimbursed fraud losses or charges.	<div data-bbox="415 243 670 281" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 315 623 346">(mm/dd/yy)</div>	<div data-bbox="748 243 1032 281" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Examples: Account statement with unauthorized charges highlighted; Correspondence from financial institution declining to reimburse you for fraudulent charges.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Professional fees incurred in connection with identity theft or falsified tax returns.	<div data-bbox="415 489 670 527" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 560 623 592">(mm/dd/yy)</div>	<div data-bbox="748 489 1032 527" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Examples: Receipt for hiring service to assist you in addressing identity theft; Accountant bill for re-filing tax return.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Credit freeze.	<div data-bbox="415 678 670 716" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 749 623 781">(mm/dd/yy)</div>	<div data-bbox="748 678 1032 716" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Example: Receipts or account statements reflecting purchases made for credit monitoring and insurance services.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Credit Monitoring ordered after receipt of the Data Incident Notice.	<div data-bbox="415 924 670 961" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 995 623 1026">(mm/dd/yy)</div>	<div data-bbox="748 924 1032 961" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Example: Receipts or account statements reflecting purchases made for credit monitoring and insurance services.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Miscellaneous expenses such as notary, fax, postage, gas, copying, mileage, and long-distance telephone charges.	<div data-bbox="415 1148 670 1186" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 1220 623 1251">(mm/dd/yy)</div>	<div data-bbox="748 1148 1032 1186" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Examples: Example: Phone bills, gas receipts, postage receipts; detailed list of locations to which you traveled (i.e. police station, IRS office) why you traveled there (i.e. police report or letter from IRS re: falsified tax return) and number of miles you traveled to remediate or address issues related to the Data Incident.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Lost interest or other damages resulting from a delayed state and/or federal tax refund in connection with fraudulent tax return filing.	<div data-bbox="415 1528 670 1566" style="border: 1px solid black; text-align: center;"> / / </div> <div data-bbox="488 1600 623 1631">(mm/dd/yy)</div>	<div data-bbox="748 1528 1032 1566" style="border: 1px solid black; text-align: center;"> \$. </div>	<p><i>Examples: Letter from IRS or state about tax fraud in your name; Documents reflecting length of time you waited to receive federal and/or state tax refund and the amount of any tax refund that you did not receive due to the tax fraud.</i></p> <p>Your documents: _____</p>

<input type="checkbox"/> Other (provide detailed description).	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="display: flex; justify-content: space-around; width: 100%;"> // </div> </div> <div style="text-align: center;">(mm/dd/yy)</div>	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> \$ </div> <div style="display: flex; justify-content: space-around; width: 100%;"> . </div> </div>	<p><i>Please provide detailed description below or in a separate document submitted with this Claim Form.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Fraudulent bank or credit card charges.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="display: flex; justify-content: space-around; width: 100%;"> // </div> </div> <div style="text-align: center;">(mm/dd/yy)</div>	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> \$ </div> <div style="display: flex; justify-content: space-around; width: 100%;"> . </div> </div>	<p><i>Examples: Account statement with unauthorized charges highlighted; correspondence with credit card company disputing the charges.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Fraudulent tax filings.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="display: flex; justify-content: space-around; width: 100%;"> // </div> </div> <div style="text-align: center;">(mm/dd/yy)</div>	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> \$ </div> <div style="display: flex; justify-content: space-around; width: 100%;"> . </div> </div>	<p><i>Examples: Letter from IRS or state about tax fraud in your name; Accountant bill for re-filing tax return.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Opening of bank accounts and/or credit cards in your name.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="display: flex; justify-content: space-around; width: 100%;"> // </div> </div> <div style="text-align: center;">(mm/dd/yy)</div>	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> \$ </div> <div style="display: flex; justify-content: space-around; width: 100%;"> . </div> </div>	<p><i>Examples: Notification from bank of new credit card or account; correspondence with bank about closing the account.</i></p> <p>Your documents: _____</p>
<input type="checkbox"/> Government benefits taken in your name.	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> </div> <div style="display: flex; justify-content: space-around; width: 100%;"> // </div> </div> <div style="text-align: center;">(mm/dd/yy)</div>	<div style="border: 1px solid black; width: 100px; height: 20px; margin: 0 auto; text-align: center;"> <div style="display: flex; justify-content: space-around; width: 100%;"> \$ </div> <div style="display: flex; justify-content: space-around; width: 100%;"> . </div> </div>	<p><i>Examples: Notification of unemployment benefits being taken; correspondence with agency regarding issue.</i></p> <p>Your documents: _____</p>

If you **do not submit** reasonable documentation supporting a claim for Out-of-Pocket Losses, or your claim for an Out-of-Pocket Loss payment is rejected by the Settlement Administrator for any reason and you do not cure the defect, only your claims for Lost Time and/or Pro Rata Cash Payments, if such claims are made, will be considered.

III. CERTIFICATION

By submitting this Claim Form, I certify that I am eligible to make a claim in this Settlement and that the information provided in this Claim Form and any attachments are true and correct. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. I understand that this claim may be subject to audit, verification, and Court review and that the Settlement Administrator may require supplementation of this Claim or additional information from me. I also understand that all claims for payments under this Settlement are subject to the availability of settlement funds and may be reduced in part or in whole, depending on the type of claim and the determinations of the Settlement Administrator.

Signature: _____

Date: _____

Print Name: _____

EXHIBIT E

From: [DPierre](#)
To: [Abrams v SCAD](#)
Subject: Re: Court Authorized Notice of Settlement Reminder
Date: Monday, July 10, 2023 2:33:22 PM

You don't often get email from dpwilson007@gmail.com. [Learn why this is important](#)

Hello,

I object!!!

As a [top-tier cybersecurity professional](#), I understand *intimately* the reasons why a firm would fail at protecting the data of their stakeholders and I know that it is possible to do **everything** **right** (with the definition of **right** in constant flux when it comes to cybersecurity) yet still fail.

With that said, I object under 2 conditions:

1. SCAD has done everything **right**, yet has still failed, then I object and wish to defend SCAD, demonstrating why I believe so as SCAD and Paula Wallace's efforts have been good to me and mine.
2. SCAD has been negligent in their cybersecurity program, then I object on the basis that the compromised data of any of SCAD students and faculty would be worth so little and wish to increase the amount to more appropriate levels befitting of SCAD. Then I would like to audit and understand what happen with specifically **my** data so that I can take matters to clean up and protect myself from further damages. I have been a victim of cyber fraud in recent years and the first place many are exposed are in the dark web forums selling their stolen data.

Please let me know if my entry has made it in time and will be considered.

Thank you for your time.

Douglas Pierre Wilson I
SCAD Alumn

On Mon, Jul 10, 2023 at 1:31 PM Office of the Settlement Administrator
<savannahcollegedatasettlement@atticusadmin.com> wrote:

EXHIBIT F

Claimant ID:
Last Name:Administration

**NOTICE OF PROPOSED CLASS ACTION SETTLEMENT
UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF GEORGIA**

Abrams v. The Savannah College of Art & Design, Inc., No. 1:22-cv-04297-LMM
A court has authorized this Notice. This is not a solicitation from a lawyer.

**If You Were Subject to The Savannah College of Art and Design Data Security Incident
and Previously Received a Notice Letter Notifying You of the Data Security Incident,
You Could be Eligible for a Payment from a Class Action Settlement**

- You may be eligible to receive a payment from a proposed \$375,000 non-reversionary class action settlement (the “Settlement Fund”).
- The class action lawsuit concerns a data security incident that occurred in or around August 2022 (the “Data Security Incident”) involving The Savannah College of Art and Design, Inc. (“SCAD” or “Defendant”) in which it was determined that an unauthorized third party may have gained access to certain SCAD files containing current and former students’ and certain employees’ sensitive personal information, including names, Social Security numbers, and dates of birth (“Private Information”). SCAD denies any wrongdoing and denies that it has any liability but has agreed to settle the lawsuit on a class wide basis.
- To be eligible to make a claim, you must have received a notice letter of the SCAD Data Security Incident that occurred in August 2022.
- Eligible claimants under the Settlement Agreement will be eligible to receive one, two and/or three of the following Settlement benefits:
 - **Out-of-Pocket Losses:** Reimbursement for the actual amount of unreimbursed out-of-pocket losses or expenses up to \$5,000, with supporting documentation of the monetary losses or expenses;
 - **Lost Time:** Compensation of up to \$125 for time spent dealing with issues related to the Data Security Incident, including but not limited to reviewing your accounts, enrolling in credit protection services, or responding to fraud, identity theft, or other alleged misuse of your personal information that is fairly traceable to the Data Security Incident; and/or,
 - **Pro Rata Cash Payment:** \$50 cash payment from the Settlement Fund that will be increased or decreased pro rata depending on the amount remaining in the Settlement Fund after allocation of the Settlement Fund for reimbursement of documented Out-of-Pocket Losses, payments for lost time, attorneys’ fees and expenses, and Notice and Administrative Expenses.
- For more information or to submit a Claim Form visit www.savannahcollegedatasettlement.com or call 1-888-230-9714 Monday through Friday, between 8:00 a.m. and 4:00 p.m. CDT.
- **Please read this Notice carefully. Your legal rights will be affected, and you have a choice to make at this time.**

	Summary of Legal Rights	Deadline(s)
Submit a Claim Form	The only way to receive payment.	Submitted or Postmarked on or Before August 8, 2023.
Exclude Yourself By Opting Out of the Class	Receive no payment. This is the only option that allows you to keep your right to bring any other lawsuit against Defendant	Submitted or Postmarked on or Before July 10, 2023.

	for the same claims if you are a Class Member.	
Object to the Settlement and/or Attend the Fairness Hearing	You can write to the Court about why you agree or disagree with the Settlement. The Court cannot order a different Settlement. You can also ask to speak to the Court at the Final Approval Hearing on September 19, 2023, about the fairness of the Settlement, with or without your own attorney.	Received on or Before July 10, 2023.
Do Nothing	Receive no payment. Give up rights if you are a Class Member.	No Deadline.

- Your rights and options as a Class Member – and the deadlines to exercise your rights – are explained in this Notice.
- The Court still will have to decide whether to approve the Settlement. Payments to class members will be made if the Court approves the Settlement and after any possible appeals are resolved.

BASIC INFORMATION

1. Why is there a Notice?

The Court authorized this Notice because you have a right to know about the Settlement, and all of your options, before the Court decides whether to give “final approval” to the Settlement. This Notice explains the nature of the lawsuit that is the subject of the Settlement, the general terms of the Settlement, and your legal rights and options.

Judge Leigh Martin May of the United States District Court for the Northern District of Georgia is overseeing this case captioned as Abrams v. The Savannah College of Art and Design, Inc., No. 1:22-cv-04297-LMM. The person who brought the lawsuit is called the Plaintiff, Laura Abrams. The entity being sued, The Savannah College of Art and Design, Inc., is called the Defendant.

2. What is this lawsuit about?

The lawsuit claims that Defendant was responsible for the Data Security Incident and asserts claims such as: negligence; breach of contract; unjust enrichment; invasion of privacy; and violation of O.C.G.A. Section 13-6-11.

Defendant denies these claims and says it did not do anything wrong. No court or other judicial entity has made any judgment or other determination that Defendant has any liability for these claims or did anything wrong.

3. Why is this lawsuit a class action?

In a class action, one or more people called class representatives or representative plaintiffs sue on behalf of all people who have similar claims. Together, all of these people are called a class, and the individuals are called class members. One court resolves the issues for all class members, except for those who exclude themselves from the class.

4. Why is there a Settlement?

The Court has not decided in favor of the Plaintiff or Defendant. Instead, both sides agreed to the Settlement. The Settlement avoids the cost and risk of a trial and related appeals, while providing benefits to members of the Settlement Class (“Settlement Class Members”). The Class Representative appointed to represent the Settlement Class and the attorneys for the Settlement Class (“Class Counsel,” see Question 18) think the Settlement is best for all Settlement Class Members.

WHO IS IN THE SETTLEMENT?

5. How do I know if I am part of the Settlement?

You are affected by the Settlement and potentially a member of the Settlement Class if you reside in the United States and your Private Information may have been compromised in connection with the Data Security Incident, including if you were mailed a notification by or on behalf of SCAD regarding the Data Security Incident.

Only Settlement Class Members are eligible to receive benefits under the Settlement. Specifically excluded from the Settlement Class are (1) the judge presiding over the class action lawsuit and her direct family members; (2) the Defendant, its subsidiaries, parent companies, successors, predecessors, and any entity in which the Defendant or its parents have a controlling interest and their current or former officers, directors, and employees; and (3) Settlement Class Members who submit a valid request to be excluded from the Settlement.

6. What if I am not sure whether I am included in the Settlement?

If you are not sure whether you are included in the Settlement, you may call 1-888-230-9714 with questions. You may also write with questions to:

Abrams v. The Savannah College of Art and Design, Inc.
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164
www.savannahcollegedatasettlement.com
Email: savannahcollegedatasettlement@atticusadmin.com

THE SETTLEMENT BENEFITS – WHAT YOU GET IF YOU QUALIFY

7. What does the Settlement provide?

The Settlement provides that Defendant will fund the following payments up to a total of \$375,000: (a) \$25 per hour, up to a total of \$125, for Settlement Class Members who attest that the time claimed was actually spent as a result of the Data Security Incident; (b) up to \$5,000 for reimbursement of your documented Out-of-Pocket Losses reasonably traceable to the Data Security Incident; and (c) a pro rata \$50 payment, subject to adjustment as set forth below.

The \$50 pro rata payment will be dispersed after the distribution of attorneys' fees, Class Counsel's litigation expenses, Notice and Administrative Expenses, and other Settlement benefits to claimants. The other Settlement benefits are also subject to pro rata reduction as needed in the event that the total claims exceed the \$375,000 cap on payments to be made by Defendant, and payments may also be increased on a pro rata basis until the Settlement Fund is distributed. Payment of (1) attorneys' fees, costs, and expenses (see Question 19) and (2) the costs of notifying the Settlement Class and administering the Settlement will also be paid out of the Settlement Fund.

Also, as part of the Settlement, Defendant either has undertaken or will undertake certain reasonable steps to further secure its systems and environments.

8. What payments are available for reimbursement under the Settlement?

Settlement Class Members who submit a claim are eligible to receive:

a) Reimbursement of actual, documented, unreimbursed Out-of-Pocket Losses resulting from the Data Security Incident (up to \$5,000 in total), such as the following incurred on or after August 22, 2022:

- any costs incurred from credit monitoring services or ordering copies of your credit report;
- late fees, declined payment fees, overdraft fees, returned check fees, customer service fees, and/or card cancellation or replacement fees;
- late fees from transactions with third parties that were delayed due to fraud or card replacement;
- unauthorized charges on credit, debit, or other payment cards that were not reimbursed;
- parking expenses or other transportation expenses for trips to a financial institution to address fraudulent charges or receive a replacement payment card;
- costs incurred obtaining credit freezes; and
- other expenses that are reasonably attributable to the Data Security Incident that were not reimbursed.

b) Compensation for time spent (lost time) remedying issues related to the Data Security Incident, up to 5 hours at \$25.00/hour for time spent in response to the Data Security Incident for a total amount of up to \$125.

c) A potential residual cash payment of the remainder funds, which is estimated to be \$50 but may adjusted upward or downward pro rata based on how many other claims are made.

HOW DO YOU SUBMIT A CLAIM?

9. How do I get a benefit?

To receive a benefit under the Settlement, you must complete and submit a claim for that benefit (a “Claim”). Every Claim must be made on a form (“Claim Form”) available at www.savannahcollegedatasettlement.com or by calling 1-888-230-9714. Claim Forms will also be sent to Settlement Class Members as part of the postcard Notice and tear-off Claim Form that will be mailed to Settlement Class Members. Read the instructions carefully, fill out the Claim Form, provide the required documentation, and submit it according to the instructions on the Claim Form.

10. How will claims be decided?

The Settlement Administrator will decide whether and to what extent any Claim made on each Claim Form is valid. The Settlement Administrator may require additional information. If you do not provide the additional information in a timely manner then the Claim will be considered invalid and will not be paid.

11. When will I get my payment?

The Court will hold a Final Approval Hearing on September 19, 2023, at 10 a.m. ET to decide whether to approve the Settlement. If the Court approves the Settlement, there may be appeals from that decision and resolving those can take time, perhaps more than a year. It also takes time for all the Claim Forms to be processed. Please be patient.

WHAT DOES DEFENDANT GET?

12. What am I giving up as part of the Settlement?

The Defendant gets a release from all claims covered by this Settlement. Thus, if the Settlement becomes final and you do not exclude yourself from the Settlement, you will be a Settlement Class Member and you will give up your right to sue Defendant and other persons (“Released Parties”) as to all claims (“Released Claims”) arising out of or relating to the Data Security Incident. This release is described in the Settlement Agreement, which is available at www.savannahcollegedatasettlement.com. If you have any questions you can talk to the law firms listed in Question 18 for free or you can talk to your own lawyer.

EXCLUDING YOURSELF FROM THE SETTLEMENT

If you do not want to be part of this Settlement, then you must take steps to exclude yourself from the Settlement Class. This is sometimes referred to as “opting out” of the Settlement Class.

13. If I exclude myself, can I get a payment from this Settlement?

No. If you exclude yourself, you will not be entitled to receive any benefits from the Settlement, but you will not be bound by any judgment in this case.

14. If I do not exclude myself, can I sue Defendant for the same thing later?

No. Unless you exclude yourself, you give up any right to sue Defendant (and any other Released Parties) for the claims that this Settlement resolves. You must exclude yourself from the Settlement Class to start your own lawsuit or to be part of any different lawsuit relating to the claims in this case. If you want to exclude yourself, then do not submit a Claim Form to ask for any benefit under the Settlement.

15. How do I exclude myself from the Settlement?

To exclude yourself, send a letter that says you want to be excluded or opt-out from the Settlement in *Abrams v. The Savannah College of Art and Design, Inc.*, No. 1:22-cv-04297-LMM (N.D. Georgia). The letter must: (a) state your full name, address, and telephone number; (b) contain your personal and original signature or the original signature of a person authorized by law to act on your behalf; and (c) state unequivocally your intent to be excluded from the Settlement. You must mail your exclusion request postmarked by July 10, 2023, to:

Abrams v. The Savannah College of Art and Design, Inc.
Attn: Exclusion Request
PO Box 64053
St. Paul, MN 55164

OBJECTING TO THE SETTLEMENT

16. How do I tell the Court that I do not like the Settlement?

You can tell the Court that you do not agree with the Settlement or some part of it by objecting to the Settlement. The Court will consider your views in its decision on whether to approve the Settlement. The Court can only approve or deny the Settlement and cannot change its terms. To object, you must mail your objection to the Clerk of the Court and the Settlement Administrator, at the mailing addresses listed below, postmarked by no later than the Objection Deadline, July 10, 2023:

Clerk of the Court
Richard B. Russell Federal Building
2211 United States Courthouse
75 Ted Turner Drive, SW
Atlanta, GA 30303-3309

Settlement Administrator
Abrams v. The Savannah College of Art and Design, Inc.
C/O Atticus Administration, LLC
PO Box 64053
St. Paul, MN 55164

Your objection must be written and must include all of the following: (1) the name of the proceedings; (2) the Settlement Class Member's full name, current mailing address, and telephone number; (3) a statement of the specific grounds for the objection, as well as any documents supporting the objection; (4) the identity of any attorneys representing the objector; (5) a statement regarding whether the Settlement Class Member (or his/her attorney) intends to appear at the Final Approval Hearing; (6) a statement identifying all class action settlements objected to by the Settlement Class Member in the previous five years; and (7) the signature of the Settlement Class Member or the Settlement Class Member's attorney.

17. What is the difference between objecting and asking to be excluded?

Objecting is telling the Court that you do not like the Settlement and why you do not think it should be approved. You can object only if you are a Settlement Class Member. Excluding yourself is telling the Court that you do not want to be part of the Settlement Class and do not want to receive any payment from the Settlement. If you exclude yourself, then you have no basis to object because you are no longer a member of the Settlement Class and the case no longer affects you. If you submit both a valid objection and a valid request to be excluded, you will be deemed to have only submitted the request to be excluded.

THE LAWYERS REPRESENTING YOU

18. Do I have a lawyer in this case?

Yes. The Court appointed Terence R. Coates, Dylan J. Gould, and Justin C. Walker of Markovits, Stock & DeMarco, LLC, 119 E. Court Street, Suite 530, Cincinnati, OH 45202 and N. Nickolas Jackson, The Finley Firm, P.C., 3535 Piedmont Road, Building 14, Suite 230, Atlanta, GA 30305 as Class Counsel to represent the Class. If you want to be represented by your own lawyer, then you may hire one at your own expense.

19. How will the lawyers be paid?

Class Counsel will ask the Court for an award for attorneys' fees up to \$125,000, plus litigation expenses not to exceed \$10,000. Defendant has agreed not to object to any award of attorneys' fees, costs, and expenses up to those amounts, to the extent they are approved by the Court. This payment for any attorneys' fees and expenses to Class Counsel will be made out of the Settlement Fund. Any such award would compensate Class Counsel for investigating the facts, litigating the case, and negotiating the Settlement and will be the only payment to them for their efforts in achieving this Settlement and for their risk in undertaking this representation on a wholly contingent basis.

Any award for attorneys' fees and expenses for Class Counsel must be approved by the Court. The Court may award less than the amount requested. Class Counsel's papers in support of final approval of the Settlement will be filed no later than September 5, 2023, and their application for attorneys' fees, costs, and expenses will be filed no later than June 26, 2023, and will be posted on the settlement website.

THE COURT'S FINAL APPROVAL HEARING

20. When and where will the Court decide whether to approve the Settlement?

The Court will hold a Final Approval Hearing at **10 a.m. EDT on September 19, 2023**, at 2167 Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Courtroom 2107 or by remote or virtual means as ordered by the Court. At this hearing, the Court will consider whether the Settlement is fair, reasonable, and adequate. If there are timely and valid objections, then the Court will consider them and will listen to people who have asked to speak at the hearing if such a request has been properly made. The Court will also rule on the request for an award of attorneys' fees and reasonable costs and expenses. After the hearing the Court will decide whether to approve the Settlement. We do not know how long these decisions will take. The hearing may be moved to a different date or time without additional notice, so Class Counsel recommends checking www.savannahcollegedatasettlement.com or calling 1-888-230-9714.

21. Do I have to attend the hearing?

No. Class Counsel will present the Settlement Agreement to the Court. You or your own lawyer are welcome to attend at your expense, but you are not required to do so. If you send an objection, you do not have to visit the Court to talk about it. As long as you filed your written objection on time with the Court and mailed it according to the instructions provided in Question 16, the Court will consider it.

22. May I speak at the hearing?

You may ask the Court for permission to speak at the final fairness hearing. To do so, you must file an objection according to the instructions in Question 16, including all the information required. Your objection must be **mailed** to the Clerk of the Court and Settlement Administrator postmarked no later than July 10, 2023.

IF YOU DO NOTHING

23. What happens if I do nothing?

If you do nothing you will not get any money from this Settlement. If the Settlement is granted final approval and the judgment becomes final, then you will not be able to start a lawsuit, continue with a lawsuit, or be part of any other lawsuit against Defendant and the other Released Parties based on any of the Released Claims related to the Data Security Incident, ever again.

GETTING MORE INFORMATION

24. How do I get more information?

This Notice summarizes the proposed Settlement. More details are in the Settlement Agreement itself. A copy of the Settlement Agreement is available at www.savannahcollegedatasettlement.com. You may also call the Settlement Administrator with questions or request a Claim Form at 1-888-230-9714.

This Notice is approved by the United States District Court for the Northern District of Georgia. **DO NOT CONTACT THE COURT DIRECTLY IF YOU HAVE QUESTIONS ABOUT THE SETTLEMENT.** Please contact the Settlement Administrator or Class Counsel if you have any questions about the Settlement.

Atticus Administration | PO BOX 64053, ST PAUL, MN 55164

Unsubscribe_thebodyshopfacta@atticusadmin.com

[Constant Contact Data Notice](#)

Sent by savannahcollegedatasettlement@atticusadmin.com

EXHIBIT G

CLASS MEMBER ID: «claimant_id»
CLAIM NUMBER: «claim_form_number»
DATE: «cure_letter_print_date»



Class Member ID: «claimant_id» «seq»
«first_name» «last_name»
«address1» «address2»
«city» «state» «zip»

NOTICE OF DEFICIENT CLAIM FORM / OPPORTUNITY TO CORRECT

Dear «first_name» «last_name»:

Thank you for submitting your Claim Form in the *Abrams v The Savannah College of Art & Design, Inc.*, No. 1:22-cv-04297-LMM (N.D. Ga) class action settlement. You are receiving this letter because the Claim Form you submitted did not meet the requirements of a valid claim and the parties wish to provide you an opportunity to meet the requirements through a further submission. **You have until «cure_return_deadline_date» to respond with the information necessary to correct the deficiency(s) specified in the next section of this letter. If you wish to submit corrective information either email it, mail it, or fax it to the recipient addresses identified at the bottom of this letter.**

«cl_no_loss_time_hours»
«cl_out_of_pocket_table_blank»
«cl_out_of_pocket_doc_issue»
«cl_no_signature»
«cl_no_benefit_selected»

Again, to be eligible for compensation or other benefit offered in the Claim Form, you must provide the information described above no later than «cure_return_deadline_date». **Failure to respond to this deficiency notice and provide the requested information by «cure_return_deadline_date» will result in the rejection of your claim and you will not be eligible to receive compensation or other benefit offered in the Claim Form.**

Please send your fully completed and signed Claim Form to the Settlement Administrator's office:

FILE ONLINE: www.SavannahCollegeDataSettlement.com

BY EMAIL: SavannahCollegeDataSettlement@atticusadmin.com

BY FAX: 1-888-326-6411

BY MAIL: Abrams v The Savannah College of Art & Design, Inc.
c/o Atticus Administration
PO Box 64053
St. Paul, MN 55164

For more information, please call toll-free 1-888-230-9714 or visit the Settlement Website at SavannahCollegeDataSettlement@atticusadmin.com.

Sincerely,

Office of the Settlement Administrator